

IN RE: JOSIE M. SANDERS

CHAPTER 13

DEBTOR

CASE NO. 14-12715 JDW

RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 33]

COMES NOW, Josie M. Sanders, by and through her attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

1. The Debtor admits the allegations contained in Paragraph 1.
2. The Debtor admits the allegations contained in Paragraph 2.
3. The Debtor denies the allegations contained in Paragraph 3. The Debtor has paid a portion of her delinquency and intends to pay the remaining amount in May in addition to her entire May plan payment.

WHEREFORE, PREMISES CONSIDERED, Debtor prays, upon a hearing hereon, this Court deny Trustee's Motion To Dismiss and that she be allowed to catch up her payments and for such other and further relief that this court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED,
/s/ Karen B. Schneller
KAREN B. SCHNELLER, MSB #6558
ROBERT H. LOMENICK, JR., MSB #104186
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CERTIFICATE OF SERVICE

I, Karen B. Schneller/Robert H. Lomenick, Attorney for Debtor, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtors, either by electronic means or by United States Mail to the following: .

Locke Barkley
Chapter 13 Trustee
6360 I 55 North, Suite 140
Jackson, Mississippi 39211

U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39269

This the 8th day of May, 2019.

/s/ Karen B. Schneller
KAREN B. SCHNELLER